

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION (AKRON)

In re the Bankruptcy of:

**MICHAEL SHAWN MOBLEY,
SR. and KARI MOBLEY,**

Debtors.

CHAPTER 13

CASE NO. 16-51550

JUDGE: ALAN M. KOSCHIK

**DEBTORS' MOTION TO MODIFY
THE CHAPTER 13 PLAN PAID TO
DATE**

Debtors Michael Shawn Mobley, Sr., and Kari Mobley, through counsel, respectfully submit this Motion to Modify the Chapter 13 Plan paid to date. In support, they state as follows:

1. This case was filed on June 29, 2016, and was confirmed on September 30, 2016.
2. The Debtors have made 36 monthly payments.
3. On May 28, 2020, the Summit County Fiscal Office filed an Amended Proof of Claim stating that \$9,221.65 in property taxes for the Debtors' home at 63 Organ Ave. are due and owing.
4. The Summit County Fiscal Office has indicated that the Debtors can make arrangements for a payment plan to address these property taxes directly with the Office rather than paying same through the Plan.

The Debtors respectfully request an Order modifying the Chapter 13 Plan Paid to Date in order to permit them to obtain a discharge of their other debts and obtain their fresh start. The Debtors understand and agree that the Summit County Fiscal Officer will not be discharged and that the remaining property-tax balance will survive their bankruptcy, requiring them to make arrangements directly with Summit County Fiscal Office to pay these taxes outside the plan after discharge.

Respectfully submitted,

/s/ Rebecca J. Sremack

Rebecca J. Sremack #0092313
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Counsel for Debtors

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing *Debtors' Motion to Modify the Chapter 13 Plan Paid to Debt* was served this 27th day of April, 2021, as follows:

By certified mail, return receipt requested, upon:

Kristen M. Scalise
Summit County Fiscal Officer
175 S. Main Street
Akron, Ohio 44308

By regular U.S. mail, postage prepaid, upon the parties indicated on the mailing list, following on the attached mailing list, identified as Exhibit "A"; and

Via the Court's electronic case filing (ECF) system upon those parties indicated on the Court's electronic mail notice list, namely:

Chapter 13 Trustee, Keith Rucinski

U.S. Trustee

/s/ Rebecca J. Sremack

Rebecca J. Sremack #0092313
Counsel for Debtors

Label Matrix for L
647-5
ase 16-51550-amk
orthern District
kron

Tue Apr 27 09:37:24 EDT 2021

55 John F. Seiberling Federal Building
S Courthouse
South Main Street
kron, OH 44308-1848

me
W Albrecht Grocery - Dept 55299
O Box 1910
kron, OH 44309-1910

fni Collections
O Box 3517
loomington, IL 61702-3517

esthesia Assoc Akron
Akron General Ave
kron, OH 44307-2432

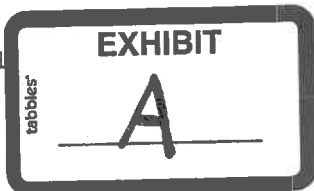
Capital One Bank (USA), N.A.
O Box 71083
Charlotte, NC 28272-1083

Century Link
O Box 4300
Carol Stream, IL 60197-4300

onvergent Outsourcing Inc
0750 Hammerly Blvd #200
Houston, TX 77043-2317

David Sed
69 W Main St
avenna, OH 44266-2743

Enhanced Recovery Co LLC
O Box 23870
Jacksonville, FL 32241-3870



US Department of Education
PO Box 16448
Saint Paul, MN 55116-0448

AMCA Collection Agency
PO Box 1235
Elmsford, NY 10523-0935

Advance America
135 N Church St
Spartanburg, SC 29306-5138

Akron Children's Hospital
PO Box 1757
Akron, OH 44309-1757

Barberton Citizens Hosp
155 Fifth St NE
Barberton, OH 44203-3398

Capital One Bank NA
PO Box 6492
Carol Stream, IL 60197-6492

(p)JPMORGAN CHASE BANK N A
BANKRUPTCY MAIL INTAKE TEAM
700 KANSAS LANE FLOOR 01
MONROE LA 71203-4774

County of Summit Sanitary Sewer Svc
1180 S Main St Ste 201
Akron, OH 44301-1254

Directv, LLC
by American InfoSource LP as agent
PO Box 5008
Carol Stream, IL 60197-5008

First American Loans
1 First American Way
Santa Ana, CA 92707-5913

University of Akron
c/o KEITH D. WEINER & ASSOC. CO., L.P.A
1100 SUPERIOR AVE EAST, SUITE 1100
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AT&T
PO Box 6416
Carol Stream, IL 60197-6416

Afni Collections
1310 Martin Luther King Dr
PO Box 3517
Bloomington, IL 61702-3517

Akron Pathology
400 Wabash
Akron, OH 44307

Capital One
PO Box 6492
Carol Stream, IL 60197-6492

Cashland
10417 N May Ave
Oklahoma City, OK 73120-2610

Citizens/RBS
PO Box 42010
Providence, RI 02940-2010

(p)CREDIT PROTECTION ASSOCIATION LP
PARKWAY CENTER V
2500 DALLAS PARKWAY SUTIE 500
PLANO TX 75093-4805

Dish Network
PO Box 94063
Palatine, IL 60094-4063

First Credit Intl Corp/Summa
PO Box 13283
Fairlawn, OH 44334-8683

First Energy Toledo Edison PO Box 3687 Akron, OH 44309-3687	HMC Group Collection Agency PO Box 16211 Rocky River, OH 44116-0211	Joseph R Harrison Co LPA 310 N Cleveland Massillon Rd Akron, OH 44333-9302
Tristen M. Scalise Summit County Fiscal Officer 75 S. Main Street Akron, Ohio 44308-1306	LabCare 441 Wolf Ledges Ste 107 Akron, OH 44311-1038	Montgomery Lynch Assoc PO Box 21369 Brecksville, OH 44141
ICB Management PO Box 1099 Langhorne, PA 19047-6099	Nationwide Credit Inc PO Box 26314 Lehigh Valley, PA 18002-6314	Ohio Attorney General Officer PO Box 89471 Cleveland, OH 44101-6471
Ohio Edison 6001 NASA Blvd Fairmont WV 26554-8248	Ohio Edison PO Box 3687 Akron, OH 44309-3687	(p)PNC BANK RETAIL LENDING P O BOX 94982 CLEVELAND OH 44101-4982
Pedatrix Medical Group PO Box 88087 Chicago, IL 60680-1087	Quantum3 Group LLC as agent for Sadino Funding LLC PO Box 788 Kirkland, WA 98083-0788	Quest Diagnostics PO Box 740505 Cincinnati, OH 45274-0505
(p)REVENUE ASSISTANCE CORPORATION 711 CHESTER AVE SUITE 200 CLEVELAND OH 44114-4623	Richard Kaplow 808 Rockefeller Bldg 614 Superior Ave NW Cleveland, OH 44113-1334	Summa Health System 1077 Gorge Blvd Akron, OH 44310-2408
Summit Servicing Agency 605 N 115 St Ste 100 Omaha, NE 68154-2507	Surgery Center 4125 Medina Rd Akron, OH 44333-4514	Team PO Box 1643 Stow, OH 44224-0643
(p)TEAM RECOVERY INC PO BOX 1643 STOW OH 44224-0643	Thomas A Turner DDS 1655 W Market St Ste 530 Akron, OH 44313-7097	Time Warner Cable PO Box 0901 Carol Stream, IL 60132-0901
Toledo Edison 6001 NASA Blvd Fairmont WV 26554-8248	Toledo Radiological Assoc Inc PO Box 2204 Indianapolis, IN 46206-2204	U.S. Department of Education P.O. Box 16448 Saint Paul, MN 55116-0448
Unique National Collections 19 E. Maple Street Jeffersonville, IN 47130-3439	United Collections Bureau PO Box 140190 Toledo, OH 43614-0190	United Telephone Company of Ohio CenturyLink Bankruptcy 359 Bert Kouns Shreveport LA 71106-8124

University Of Akron
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Way Public Library
101 E Indiana Ave
Perrysburg, OH 43551-2295

Women's Health Group
121 Northwest Ave.
Tallmadge, OH 44278-1809

Mari Marie Mobley
63 Organ Ave.
Akron, OH 44319-3070

Keith Rucinski
Chapter 13 Trustee
One Cascade Plaza Suite 2020
Akron, OH 44308-1160

Michael Shawn Mobley Sr.
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Akron, OH 44319-3070

Rebecca J. Sremack
Sremack Law Firm
1745 S. Arlington Road
Akron, OH 44312-4713

William M. Sremack
2745 S Arlington Road
Akron, OH 44312-4713

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Chase Bank
21 W Main St
Tafford, AZ 85546

Credit Protect Assoc
PO Box 9037
Addison, TX 75001

(d)National Payment Services
OH1-1272
PO Box 182223
Columbus, OH 43218

NC Bank
PO Box 535230
Pittsburgh, PA 15253

Revenue Group
4780 Hinckley Ind. Pkwy Ste 200
Cleveland, OH 44109

Team Recovery
PO Box 1643
3928 Clock Pt Trail Ste 101
Stow, OH 44224

End of Label Matrix
Mailable recipients 67
Bypassed recipients 0
Total 67